



**Scholarship, Think-Tank, UN and NGO Reports on the
Humanitarian and Human Rights Impacts of Economic Sanctions (2019-2022)***

United Nations reports:

- Antonio Guterres: *The Highest Aspiration: A Call to Action for Human Rights* (2020)
https://www.un.org/sg/sites/www.un.org.sg/files/atoms/files/The_Highest_Asperati_on_A_Call_To_Action_For_Human_Right_English.pdf
- A/HRC/42/46: Negative impact of unilateral coercive measures on the enjoyment of human rights - Report of the Special Rapporteur on the negative impact of unilateral coercive measures on the enjoyment of human rights, July 5, 2019,
<https://www.ohchr.org/en/documents/thematic-reports/ahrc4246-negative-impact-unilateral-coercive-measures-enjoyment-human>
- A/HRC/45/7: Report on the negative impact of unilateral coercive measures: priorities and road map, July 22, 2020, <https://www.ohchr.org/en/documents/thematic-reports/ahrc457-report-negative-impact-unilateral-coercive-measures-priorities>
- A/HRC/43/36: Report on the HRC panel discussion on unilateral coercive measures and human rights, April 8, 2020,
<https://www.ohchr.org/en/documents/reports/ahrc4336-report-hrc-panel-discussion-unilateral-coercive-measures-and-human>
- A/75/209: Report on the impact of unilateral sanctions on human rights during the state of emergency amid the COVID-19 pandemic, July 22, 2020,
<https://www.ohchr.org/en/documents/thematic-reports/a75209-report-impact-unilateral-sanctions-human-rights-during-state>

* This bibliographic compilation and detailed annotation is authored by Beatrix Geaghan-Breiner with guidance and assistance from George A. Lopez. Updated 28 June 2022.

- A/HRC/48/59/Corr.1: Report on the notion, characteristics, legal status and targets of unilateral sanctions, September 10, 2021, <https://www.ohchr.org/en/documents/thematic-reports/ahrc4859corr1-report-notion-characteristics-legal-status-and-targets>
- A/HRC/48/59: Report on the notion, characteristics, legal status and targets of unilateral sanctions, April 26, 2022, <https://www.ohchr.org/en/documents/thematic-reports/ahrc4859-report-notion-characteristics-legal-status-and-targets>
- A/76/174/Rev.1: Report on the targets of unilateral coercive measures: notion, categories and vulnerable groups, September 13, 2021, <https://www.ohchr.org/en/documents/thematic-reports/a76174rev1-report-targets-unilateral-coercive-measures-notion-categories>

Reports on the Humanitarian Impacts of Sanctions:

- Jason Bartlett, "[Five Ways to Improve Sanctions Coordination Between the U.S. Government and Humanitarian Aid Groups](https://www.lawfareblog.com/five-ways-improve-sanctions-coordination-between-us-government-and-humanitarian-aid-groups)," *Lawfare* (Feb. 2022). <https://www.lawfareblog.com/five-ways-improve-sanctions-coordination-between-us-government-and-humanitarian-aid-groups>

Recommendations:

1. Establish a special office within OFAC to coordinate sanctions-related inquiries between humanitarian aid organizations and the Treasury
2. Add a humanitarian aid-specific portfolio to the newly appointed sanctions coordinator position in the State Department
3. Treasury should provide explicit authorization for humanitarian aid organizations operating in heavily sanctioned countries that allows financial institutions to easily identify and facilitate humanitarian aid-related transactions entering these countries.
4. To reduce confusion about permissible financial activity, OFAC should publish a fact sheet for each country-specific sanctions program and country-related humanitarian crisis.
5. OFAC should allow familial remittances to all sanctioned countries.

- Esfandiyar Batmanghelidj, "To Make Sanctions Policy More Humane, Limit Food and Medicine Inflation," *Just Security* (Jan. 2022).
<https://www.justsecurity.org/79974/sanctions-policy-humane-limit-food-medicine-inflation/>

The humanitarian effects of sanctions are usually looked at in terms of food and medicine availability. Overlooked is the affordability of food and medicine in targeted countries. In Iran, food and healthcare prices have risen 186% and 125% respectively since Trump reimposed secondary sanctions in November of 2018. Inflation in targeted countries persists despite humanitarian exemptions.

Recommendations:

- if the U.S. is serious about mitigating humanitarian impacts, it must calibrate the bottlenecks it creates with its sanctions policies
- State Department should launch "tenders" announcing that a certain number of licenses will be provided to financial institutions that can demonstrate that they have significant demand from clients to facilitate payments related to humanitarian exports, and that they have a robust compliance framework to prevent illicit payments.

- Esfandiyar Batmanghelidj and Erica Moret, "[The Hidden Toll of Sanctions: Why Washington Must Reckon With the Devastating Inflation Its Policies Cause](https://www.foreignaffairs.com/articles/world/2022-01-17/hidden-toll-sanctions)," *Foreign Affairs* (2022), <https://www.foreignaffairs.com/articles/world/2022-01-17/hidden-toll-sanctions>

The authors argue that sanctions are weapons designed to induce inflation. Sanctions imposers must proactively prevent dramatic increases in food and medicine prices in targeted countries.

The authors explain their research, based on interviews with government officials, business people, medical professionals, and aid workers. Their research shows that sanctions cause inflation in three ways:

1. They damage the financial channels necessary to pay for goods and services quickly and reliably.
2. Undermine supply chains by limiting the number of suppliers willing to facilitate the sale of humanitarian goods.

3. Prevent long term investments in the infrastructure necessary to reduce a country's reliant on imports.

The reduced availability of essential goods is uniformly observed in sanctioned countries. It is not an indirect consequence but a direct effect of sanctions policy.

- **David Cortright and George Lopez, *The Continuing Challenge of Sanctions Reform*, Fourth Freedom Forum (2021).**

<https://www.fourthfreedomforum.org/publications/the-continuing-challenge-of-sanctions-policy-reform-2/>

This short essay is an introduction to the three reports that make up the December 2021 issue of *Peace Policy*. All three reports urge the United States to enhance humanitarian exemptions and establish special financing mechanisms for the purchase of essential civilian goods. They also argue that Washington should use sanctions as negotiating tools, not as instruments of punishment.

- **Alice Debarre, *Making Sanctions Smarter: Safeguarding Humanitarian Action*, International Peace Institute (2019)**

https://charityandsecurity.org/wp-content/uploads/2019/07/1912_Making-Sanctions-Smarter.pdf

Recommendations for safeguarding humanitarian action in contexts where sanctions regimes apply:

1. Include language that safeguards humanitarian activities in sanctions regimes
2. Raise awareness and promote multi stakeholder dialogue
3. Conduct better, more systematic monitoring of and reporting on the impacts of sanctions on humanitarian activities
4. Develop more and improved guidance on the scope of sanctions regimes
5. Improve risk management and risk sharing

- **Alice Debarre, *Safeguarding Humanitarian Action in Sanctions Regimes*, International Peace Institute (2019), https://www.ipinst.org/wp-content/uploads/2019/06/1906_Sanctions-and-Humanitarian-Action.pdf**

This brief is part of a project conducted in partnership with the International Peace Institute and the German Federal Foreign Office on “Solutions for Safeguarding Humanitarian Action in UN Security Council Sanctions Regimes.” The project’s objective

is to enhance awareness on the humanitarian impacts of sanctions regimes and propose recommendations for the UN and its member states to minimize these impacts.

It summarizes the following ways in which sanctions can impede humanitarian action:

- listing of humanitarian organizations
- costs and delays caused by exemption procedures
- restrictions on importing goods
- restrictive clauses in donor agreements
- fines and prosecution
- de-risking
- chilling effect

The author explores the staying power of these issues, and proposes avenues for progress:

- safeguards for humanitarian action
- increased and improved guidance
- more systematic monitoring and reporting on humanitarian impact
- better risk management and risk sharing
- increased dialogue between NGOs, private sector, and the UN

- Joy Gordon, "**The Not So Targeted Instrument of Asset Freezes,**" *Ethics and International Affairs*, Vol. 33, no. 3 (Fall 2019): 303-3014.
DOI: <https://doi.org/10.1017/S0892679419000315>

Main argument: asset freezes are not as targeted or "smart" as some scholars and practitioners claim. Asset freezes on government agencies and companies that hold a substantial role in the economy can be actually comprehensive in effect. Additionally, the chilling effects of asset freezes and targeted sanctions can create ripple effects in the targeted country's economy, motivating international banks to withdraw from targeted countries and making "smart" sanctions comprehensive in effect.

- Richard Hanania, "**Ineffective, Immoral, and Politically Convenient: America's Overreliance on Economic Sanctions and What to Do About It,**" CATO Institute Policy Analysis 884 (February 2020)
<https://www.jstor.org/stable/resrep23040>

The author ties the popularity of sanctions, despite their counterproductive effects, to a political culture in Congress that rewards policymakers who support sanctions and creates high political costs for opposing sanctions.

- **Sophie Huvé, Rebecca Brubaker, Adam Day, and Zuzana Hudáková, [Enforcing UN Sanctions and Protecting Humanitarian Action: Towards a Coherent and Consistent Approach](http://collections.unu.edu/view/UNU:8672), United Nations University (2022), <http://collections.unu.edu/view/UNU:8672>**

This report focuses on a central question: How can sanctions regimes be better designed and implemented to protect humanitarian action while still functioning effectively?

Using case studies, an online survey, and qualitative interviews with experts across the humanitarian and sanctions communities, the authors come to the following recommendations for the UN Security Council:

- Replicate the standing humanitarian exemption across all UN sanctions regimes
 - Require states to comply with international law, including IHL, when implementing sanctions measures across all UN regimes
 - Require states to “take into account” the impact of their implementation measures on humanitarian actors
 - Require states to “take steps to mitigate” the impact of their implementation measures on humanitarian actors
 - Clarify that sanctions are not intended to have adverse humanitarian consequences on the civilian population:
 - Clarify that sanctions measures are not intended to impede humanitarian action:
 - Mandate Panels of Experts to conduct impact assessments
 - Organize more frequent sanctions discussions in the Council
- **Sophie Huvé and Rebecca Brubaker, [Humanitarian Exemptions in UN Sanctions Regimes](http://collections.unu.edu/view/UNU:8748), United Nations University (2022), <http://collections.unu.edu/view/UNU:8748>**

This short policy memo describes three models for UN humanitarian exemptions. Model 1 is standing exemptions that are not based on a system of case-by-case applications. Model 2 is case-by-case exemptions or exemptions "upon request." Model 3 is exemptions for notification to the Sanctions Committees by UN member states.

- George Lopez, **"It's time to end senseless, endless sanctions,"** George Lopez, *Responsible Statecraft* (2021)
<https://responsiblestatecraft.org/2020/08/07/its-time-to-end-senseless-endless-sanctions/>

Key recommendations:

- sanctions should be accompanied by strong and effective diplomacy (must be one of many tools, not a policy in itself)
- attain sanctions goals from an inducement perspective
- create a "whole-of-government" approach to sanctions
- re-establish the State Department's role in sanctions policy and restore Office of Sanctions Policy (dissolved in 2017)

- George Lopez, **"Sanctions will kill and rarely win when implemented with 'full force,'"** *Responsible Statecraft* (2021)
<https://responsiblestatecraft.org/2021/08/23/sanctions-will-kill-and-rarely-win-when-implemented-with-full-force/>

The United States and other sanctions imposers have a responsibility to mitigate impacts on the innocent. Sanctions planners and structure must meet humanitarian evidence-based standards.

- George A. Lopez, **"Time to Recalibrate US Sanctions for Human Rights,"** *Inkstick* (Jan. 2022).
<https://inkstickmedia.com/time-to-recalibrate-us-sanctions-for-human-rights/>

This article argues that the counterproductive impacts of sanctions that are imposed for human rights can be reversed, and suggests recommendations for the three most difficult cases, Venezuela, Iran, and Syria:

Venezuela: the U.S. should facilitate new trade to uplift Venezuelans through a well-monitored "oil-for-essentials" program. It should offer suspension of sanctions to leverage incentives for leaders to negotiate on reforms.

Syria: U.S. should expand the list of early recovery materials needed to rebuild infrastructure, and establish a workable financial channel for banks to facilitate humanitarian supplies to the country.

Iran: Washington must end the stranglehold on Iran's access to foreign exchange.

- **Gregoire Mallard et al, "The Humanitarian Gap in the Global Sanctions Regime," *Global Governance A Review of Multilateralism and International Organizations*, Vol. 26 (2020): 121-153.**
DOI: [10.1163/19426720-02601003](https://doi.org/10.1163/19426720-02601003)

Using more than 80 interviews with treasury officials, sanctions experts, compliance officers, and others, and using the humanitarian trade into Iran as a case study, this article considers solutions to the shortcomings of humanitarian exemptions in global sanctions jurisdictions. It focuses particularly on the challenges faced by international banks engaging in humanitarian trade with targeted countries.

The authors recommend a multilateral approach to sanctions exemptions through the establishment of a panel of Treasury officials from the G-20, where OFAC would just be one voice of many. This panel would administer payments to targeted countries and provide a point of entry for new entities to initiate humanitarian trade. This multilateral management would increase the acceptability of humanitarian trade with Iran and eliminate the uncertainty over judicial litigation in the United States for non-US exporters of food and medicine trading in other targeted countries.

This paper also considers ways to initiate dialogue between the diplomatic, humanitarian, and financial technology communities to develop FinTech solutions to the humanitarian gap. For instance, the authors introduce the possibility of the multilateral panel using a Safecor coin (a single purpose digital currency) that would facilitate a clean economic circuit when money flows in and out of a targeted country.

- **Katharina Meissner and Patrick Mello, "The Unintended Consequences of UN Sanctions: A Qualitative Comparative Analysis," *Contemporary Security Policy* (2022)**
DOI: <https://doi.org/10.1080/13523260.2022.2059226>

This article uses the Targeted Sanctions Consortium data set to examine negative externalities of UN sanctions. The authors characterized negative externalities (or unintended consequences) as focusing on five dimensions: (1) increases in corruption and/or criminality, (2) strengthened authoritarian rule, (3) increases in human rights

violations, (4) humanitarian consequences, and (5) erosion of local institutional capacities.

Across all UN sanctions episodes included in the TSC data, unintended consequences are a significant phenomenon. In total, 94 percent of sanctions episodes entail unintended consequences of one form or another.

- Erica Moret, Camila Teixeira, and Zoe Pelter, ***Sanctions and Their Impact on Children***, UNICEF Discussion Paper (February 2022), <https://www.unicef.org/globalinsight/reports/sanctions-and-their-impact-children>

Case studies of the effects of sanctions in Syria, Iraq, Venezuela, and North Korea

Effects on children operate through three channels:

1. Consumption: reduced consumption power in households
2. Labor markets and household income: sanctions create heightened economic uncertainty, foreign capital flight, reduced demand for exports, all of which place further pressure on household consumption of goods.
3. Provision of government services: cuts in government spending harm vulnerable groups and households by restricting access to health, education, and social services.

The report finds that sanctions restrict childrens' access to health, water, sanitation, nutritious and adequate food, education, and COVID-19 preventative measures.

Recommendations:

1. Carefully design sanctions regimes
 2. Improve guidance and streamlining on humanitarian exemptions and licensing
 3. Safeguard banking channels
 4. Monitor and report on the humanitarian consequences of sanction regimes
 5. Conduct a legal review of sanctions regimes
- Erica Moret, ***"Unilateral and Extraterritorial Sanctions in Crisis: Implications of Their Rising Use and Misuse in Contemporary World Politics,"*** in *Research Handbook on Unilateral and Extraterritorial Sanctions*, edited by Charlotte Beaucilon (Cheltenham: Edward Elgar Publishing, 2021).

DOI: <https://doi.org/10.4337/9781839107856.00009>

- Erica Moret, "[When Should the United States Use Hard-Hitting Sectoral and Financial Sanctions?](https://theglobal.blog/2021/11/05/when-should-the-united-states-use-hard-hitting-sectoral-and-financial-sanctions/)" Geneva Graduate Institute, Global Governance Centre (2021), <https://theglobal.blog/2021/11/05/when-should-the-united-states-use-hard-hitting-sectoral-and-financial-sanctions/>

Moret argues that the United States has a responsibility to ensure its sanctions inflict little damage to vulnerable populations. She argues that in order to safeguard the legitimacy of sanctions, Washington should use targeted measures and adopt steps to reduce over-compliance with financial sanctions. Hard-hitting sectoral sanctions should only be employed in a limited number of contexts, and only when closely tied to a wide range of policy tools.

- Erica Moret, "[Time to Act: Harmonizing Global Initiatives and Technology-Based Innovations Addressing De-risking at the Interfacing Sanctions-Counterterrorism-Humanitarian Nexus](https://www.swp-berlin.org/publications/products/arbeitspapiere/WP%20International%20Sanctions.pdf)," in *International Sanctions: Improving Implementation Through Better Interface Management*, edited by Sascha Lohmann and Judith Vorrath, German Institute for International and Security Affairs (2021). [https://www.swp-berlin.org/publications/products/arbeitspapiere/WP International Sanctions.pdf](https://www.swp-berlin.org/publications/products/arbeitspapiere/WP%20International%20Sanctions.pdf)

In this paper, Moret addresses the global emergency of de-risking and overcompliance, which has hindered humanitarian action and access to critical goods in sanctioned countries. Using interviews with over 30 sanctions, humanitarian, regulatory, and banking specialists, as well as a wide range of research projects from the past decade, the paper proposes recommendations for regulatory and policy changes that hold the potential to bridge the gap between government and the financial sector on sanctions issues. She focuses on opportunities for further research and innovation, especially with respect to the development of humanitarian banking channels, SPVs, alternative payment platforms, and digital currencies.

- Ionnis Prezas, "[From Targeted States to Affected Populations: Exploring Accountability for the Negative Impact of Comprehensive Unilateral Sanctions on Human Rights](https://doi.org/10.4337/9781839107856.00032)," in *Research Handbook on Unilateral and Extraterritorial Sanctions*, edited by Charlotte Beaucilon (Cheltenham: Edward Elgar Publishing, 2021).

DOI: <https://doi.org/10.4337/9781839107856.00032>

- Assal Rad, "Should Sanctioning Countries Be Blamed for Causing Human Suffering?," *National Interest* (2022), <https://nationalinterest.org/feature/should-sanctioning-countries-be-blamed-causing-human-suffering-202011>

In this op-ed, the author argues that if states are responsible for the consequences of war, they must also be responsible for the humanitarian damage caused by economic sanctions.

- United Nations News, "Unilateral Sanctions Particularly Harmful to Women, Children, Other Vulnerable Groups," *United Nations* (Dec. 2021). <https://news.un.org/en/story/2021/12/1107492>

This article spotlights Alena Douhan (the Special Rapporteur on the negative impact of unilateral coercive measures on the enjoyment of human rights) and her perspective on the disproportionate impacts of sanctions on vulnerable groups, such as women, children, the elderly, and the sick.

- Justine Walker, "The Public Policy of Sanctions Compliance: a Need for Collective and Coordinated International Action," *International Review of the Red Cross*, Vol. 103, no. 916 (April 2021), DOI: <https://doi.org/10.1017/S181638312100093X>

- Patrick M. Weber and Gerald Schneider, "Post-Cold War Sanctioning by the EU, the UN, and the US: Introducing the EUSANCT Dataset," Patrick M Weber and Gerald Schneider, *Conflict Management and Peace Science* (2020) DOI: <https://doi.org/10.1177/0738894220948729>

This article introduces a new and improved dataset of sanctions since the end of the Cold War. Authors find that overall success of sanctions has not grown from 1989 to 2015. While the US is the most active sanctioner, the EU and the UN appear to be more successful.

- John Zaracostas, "UN Sanctions Hamper Humanitarian Work," *The Lancet* Vol. 399 (2022) DOI: [https://doi.org/10.1016/S0140-6736\(22\)00307-5](https://doi.org/10.1016/S0140-6736(22)00307-5)

This article brings in quotes from spokespeople at the United Nations, the Red Cross, and humanitarian agencies about the obstacles to humanitarian work in sanctioned countries, and the associated negative humanitarian consequences.

Country-specific reports:

Afghanistan

- Jason Bartlett, [*Sanctions by the Numbers: Spotlight on Afghanistan*](https://www.cnas.org/publications/reports/sanctions-by-the-numbers-afghanistan), Center for A New American Security (Oct. 2021).
<https://www.cnas.org/publications/reports/sanctions-by-the-numbers-afghanistan>

This report tracks and visualizes the past twenty years of sanctions programs on Afghanistan. It outlines that the major challenges that the United States faces for Afghanistan-related sanctions: (1) defining who and what exactly is "the Taliban," (2) the potential impact of sanctions on humanitarian assistance after Taliban takeover, and (3) how this all may affect future U.S.-U.N. sanctions coordination on the Taliban.

- International Crisis Group, [*Beyond Emergency Relief: Averting Afghanistan's Humanitarian Catastrophe*](https://www.crisisgroup.org/asia/south-asia/afghanistan/317-beyond-emergency-relief-averting-afghanistans-humanitarian-catastrophe), International Crisis Group (2021).
<https://www.crisisgroup.org/asia/south-asia/afghanistan/317-beyond-emergency-relief-averting-afghanistans-humanitarian-catastrophe>

In this policy report, the International Crisis Group argues that economic sanctions are unlikely to change the Taliban's behavior, and will only hurt the most vulnerable Afghans. Sanctions are also likely to trigger state collapse, destabilizing the region and provoking another migration crisis.

The authors agree that donors should indeed send humanitarian aid, but emergency relief is not enough. If the international community wishes to avert state failure and mass starvation in Afghanistan, it must help state institutions provide essential services, including health care, education, and a basic financial system.

- Jacob Kurtzer, Kelly Moss, and Sue Eckert, [*US Sanctions Squeeze Humanitarian Assistance in Afghanistan*](#), CSIS Analysis (Sep. 2021).

<https://www.csis.org/analysis/us-sanctions-squeeze-humanitarian-assistance-afghanistan>

In this CSIS analysis, the authors address the rapidly worsening humanitarian crisis in Afghanistan. They argue that frozen foreign assets, uncertainty over the scope of licenses granted by the Treasury, and reluctance to engage with the Taliban are some impediments to humanitarian assistance. The report recommends for the U.S. to clarify the scope of the broad general licenses permitting humanitarian trade with Afghanistan, and establish a safe payment channel for NGOs and humanitarian agencies to move urgently needed funds into the country.

- David Miliband, [*Afghanistan: The Humanitarian Crisis and U.S. Response*](https://www.rescue.org/press-release/david-milibands-testimony-senate-foreign-relations-committee-subcommittee-afghanistan), Testimony by International Rescue Committee to the Senate Foreign Relations Committee, <https://www.rescue.org/press-release/david-milibands-testimony-senate-foreign-relations-committee-subcommittee-afghanistan>

Miliband appealed to members of the subcommittee to help usher an urgent change in US economic policy toward Afghanistan to avert what is becoming a “catastrophe-of-choice imposed on the Afghan people.” He argues that there is a narrative that the U.S. must choose between helping the people of Afghanistan or helping the Taliban. Instead, Miliband says, there is a middle course: helping the Afghan people without embracing the new government.

Recommendations:

1. Reprogram the \$1.2 billion remaining in the World Bank-managed Afghanistan Reconstruction Trust Fund (ARTF) for basic services like health and education. These funds could be directed through UN agencies and NGOs to bypass the government.
 2. Clarify the limits of US sanctions and encourage private sector engagement in Afghanistan. Reduce the chilling climate.
 3. Inject liquidity to help the economy start functioning again.
 4. Support technical efforts with the central bank and finance ministry to stabilize the economy.
 5. Rally international support for the humanitarian response.
- Erica Moret, [*The Role of Sanctions in Afghanistan's Humanitarian Crisis*](#), IPS Global Observatory (2021).

<https://theglobalobservatory.org/2021/10/the-role-of-sanctions-in-afghanistans-humanitarian-crisis/>

This article argues that sanctions may place humanitarian strain on the Afghan people and limit the international community's ability to pressure the Taliban to not revert to its ways of the past.

Recommendations:

1. strategic relief of some existing US and UN sanctions against the Taliban could serve as a tool of leverage and allow for some political dialogue with the Taliban.
 2. Establish one or more safeguarded humanitarian banking channels into the country that would be exempted by US and UN sanctions
 3. Broaden standing exemptions (a good example can be drawn from the exemption included in the current UN Somalia sanctions regime)
 4. Sanctions imposers should proactively ensure that trade in essential goods can continue unhindered to Afghanistan
 5. Any new sanctions should be designed with assistance from health and humanitarian professionals
 6. Countries hosting Afghan populations should facilitate and safeguard their ability to send money home
- Erica Moret, "**Life and Death : NGO Access to Financial Services in Afghanistan,**" Norweigan Refugee Council (January 2022).
https://www.nrc.no/globalassets/pdf/reports/life-and-death/financial-access-in-afghanistan_nrc_jan-2022.pdf

In this report, the author uses interviews with 26 expert stakeholders and an online poll targeted at NGOs. She finds that despite a looming humanitarian crisis in Afghanistan, aid agencies are unable to operate at scale in the country because formal payment channels are almost completely unavailable to them. Humanitarian fund transfer options are severely limited, because of a combination of domestic and international factors, including a halt in most international funding, paralysis of the Afghan Central Bank, capital controls, and confusion over permissible activities under sanctions (leading to worsening overcompliance and financial sector de-risking).

Moret explores the key risks and challenges associated with each humanitarian funding channel, and proposes recommendations for future steps that can stabilize the Afghan economy and facilitate humanitarian action.

- Sahr Muhammedally, "[Humanitarian Crisis in Afghanistan Demands Urgent Action](https://civiliansinconflict.org/blog/humanitarian-crisis-in-afghanistan-demands-urgent-action/)," Center for Civilians in Conflict (2022)
<https://civiliansinconflict.org/blog/humanitarian-crisis-in-afghanistan-demands-urgent-action/>

In this Center for Civilians in Conflict blog, Muhammedally argues that since the political transition in August 2021, Afghanistan has suffered from frozen foreign reserves, crumbling public finances, and poverty. The international community has failed to develop an effective and comprehensive approach that can support Afghans with this new political reality. Walking away from Afghanistan now, the author argues, would be indefensible.

- Adam M. Smith, "[The Humanitarian and Policy Challenges of U.S. Sanctions on the Taliban](https://www.justsecurity.org/77957/the-humanitarian-and-policy-challenges-of-u-s-sanctions-on-the-taliban/)," *Just Security* (Aug. 2021).
<https://www.justsecurity.org/77957/the-humanitarian-and-policy-challenges-of-u-s-sanctions-on-the-taliban/>

Adam M. Smith, who previously served as Senior Advisor to the Director of the U.S. Treasury's Office of Foreign Assets Control, argues that with respect to Afghanistan, the United States must not leave the sanctions issue unaddressed. If it does, Afghanistan could face a terrifying humanitarian disaster akin to Yemen. The United States must not only allow but encourage humanitarian related activities in Afghanistan. It should channel the full resources of the National Security Council, OFAC, the State Department, and the intelligence community to devise strategies and tools that ensure Afghanistan does not become further endangered by unintended consequences.

- Graeme Smith, "[Afghanistan: The Humanitarian Crisis and U.S. Response](https://www.crisisgroup.org/asia/south-asia/afghanistan/afghanistan-humanitarian-crisis-and-us-response)," Graeme Smith, Testimony by International Crisis Group to the Senate Foreign Relations Committee, <https://www.crisisgroup.org/asia/south-asia/afghanistan/afghanistan-humanitarian-crisis-and-us-response>

In his testimony to the Senate Foreign Relations Committee, Smith outlines a path forward for mitigating the humanitarian distress in Afghanistan.

1. Help Prevent the Collapse of Essential Public Services
 - a. Support the public sector with existing funds: Disburse the \$1.2 billion in the World Bank's Afghanistan Reconstruction Trust Fund and allocate it to health, education, and other social services.
 - b. Build on progress in education: The biggest employer in the country is the education system, but right now there is no plan for paying 200,000 teachers and staff through the school year. The U.S. should work to revive the education sector.
 2. Support Economic Revival
 - a. Allow the Central Bank to function
 - b. Describe a path toward de-freezing of foreign assets
 3. Reduce the impact of sanctions
 - a. Encourage foreign banks to resume transactions with Afghanistan
 - b. Clarify humanitarian exemptions
- Mark Weisbrot, "[US Sanctions on Afghanistan Could Be Deadlier Than 20 Years of War,](https://cepr.net/us-sanctions-on-afghanistan-could-be-deadlier-than-20-years-of-war/)" CEPR (Feb. 2022).
<https://cepr.net/us-sanctions-on-afghanistan-could-be-deadlier-than-20-years-of-war/>

This economist predicts major damage that could result from the freezing of more than \$7 billion of the country's assets that are held at the US Federal Reserve. These assets are equivalent to about forty percent of Afghanistan's economy, and about 14 months of imports (which include food, medicine, and other essential goods). Countries need hard currency international reserves to maintain a stable financial system and economy.

Syria

- Aula Abbara et al, "[Sanctions on Syria,](https://www.thelancet.com/journals/langlo/article/PIIS2214-109X(20)30363-6/fulltext)" *The Lancet*, Vol. 8, no. 11 (Nov. 2020),
[https://www.thelancet.com/journals/langlo/article/PIIS2214-109X\(20\)30363-6/fulltext](https://www.thelancet.com/journals/langlo/article/PIIS2214-109X(20)30363-6/fulltext)
- Nancy Azar and Hend Charif, [*Navigating Humanitarian Exemptions to Sanctions Against Syria*](#), Carter Center (October 2020).

https://www.cartercenter.org/resources/pdfs/peace/conflict_resolution/syria-conflict/navigating-humanitarian-exceptions-in-syria-oct2020.pdf

This report argues for the following recommendations, which would help facilitate humanitarian trade to Syria:

-Continuous dialogue between sanctioning authorities, donors, humanitarian actors, banks, and financial sector regulators → would build trust and improve regulatory guidance, making it easier for humanitarian actors to comply with the sanctions framework and reduce the chilling effect.

-Promote regular monitoring, evaluation, and reporting on the unintended consequences of sanctions on humanitarian activities.

-Establish a financial channel between a correspondent bank and a private bank in Syria for Damascus-based humanitarian organizations to transfer directly and access funds in Syria. This will remove the risks, delays, and costs involved with informal transactions

- **Rebecca Barber, "The New U.S. "Caesar" Sanctions on Syria are Illegal," *Just Security* (2020),** <https://www.justsecurity.org/71189/the-new-u-s-caesar-sanctions-on-syria-are-illegal/>

Author argues that the extraterritoriality of the Caesar Sanctions, combined with their comprehensive nature and likely devastating humanitarian impacts, make them illegal under international law. The article cites the 2017 Draft Resolution on Unilateral Coercive Measures and the Rule of Law, written by U.N. Special Rapporteur on the negative impact of unilateral coercive measures on the enjoyment of human rights. The draft text asserts that sanctions are illegal if they apply extraterritoriality and/or if they inflict undue suffering on a civilian population.

- **Dr. Joseph Daher, "[Invisible Sanctions: How Over-Compliance Limits Humanitarian Work on Syria](#),"** ed. Erica Moret, IMPACT- Civil Society Research and Development (2020).
https://impact-csrd.org/reports/Invisible_Sanctions_IMPACT_EN.pdf

This report focuses on the challenges faced by non-profit organizations working in Syria. It is based on interviews with 70 organizations in France, the UK, Germany, Turkey, and Lebanon that pursue humanitarian work in Syria. It finds that NGOs and INGOs working in Syria have faced ever-increasing challenges and have had to cancel projects because of procedural hurdles associated with sanctions, especially difficulties transferring money and maintaining bank accounts. Despite various initiatives to facilitate financial

operations and transfers for NGOs in Syria, the author claims that no significant progress has been made. Smaller humanitarian organizations are particularly burdened by over compliance and bank de-risking processes.

The author recommends for sanctions enforcers to provide better guidance and support to international NGOs, but also argues that these challenges are not simply obstacles to overcome on a case-by-case basis, but structural. They are rooted in the current international sanctions regulatory framework.

- Aron Lund, "Briefing: Just How 'Smart' Are Sanctions on Syria," *The New Humanitarian* (2019), <https://www.thenewhumanitarian.org/analysis/2019/04/25/briefing-just-how-smart-are-sanctions-syria>
- Martin Lundqvist and Lisa Hultman, "[Civilian Wellbeing and Humanitarian Access in the Context of Targeted Sanctions: 30 Years of Sanctions Regimes in Syria, Sudan, and Somalia](https://www.rodakorset.se/globalassets/rodakorset.se/bilder/5-om-oss/fakta-och-standpunkter/civilian-wellbeing-and-humanitarian-access-in-the-context-of-targeted-sanctions-2022.pdf)," Swedish Red Cross (2022), <https://www.rodakorset.se/globalassets/rodakorset.se/bilder/5-om-oss/fakta-och-standpunkter/civilian-wellbeing-and-humanitarian-access-in-the-context-of-targeted-sanctions-2022.pdf>

This report, funded by the Swedish Red Cross and performed at Uppsala University's Department of Peace and Conflict Research, strives to provide an overview of the academic literature on how targeted sanctions impact civilian well-being; explore humanitarian consequences of targeted sanctions through three case studies – Sudan, Syria, and Somalia – and; analyze the cases comparatively to better understand how their respective sanctions regimes include varying degrees of humanitarian exemptions. The researchers find that Sudan has the weakest humanitarian exemptions. Syria exemplifies a comparative middle ground, and Somalia has the strongest humanitarian exemptions of the three cases.

- United Nations, "Warning: Future Looks Bleak' for Syrians Living Through Twelfth Year of Crisis, Top United Nations Officials Urge More Resources, Focus on Conflict," UN Security Council 9022nd Meeting (April 2022). <https://www.un.org/press/en/2022/sc14870.doc.htm>

Joyce Msuya, Assistant Secretary-General for Humanitarian Affairs and Deputy Emergency Relief Coordinator, briefed the UN Security Council on the humanitarian situation in Syria. She argued that Syria is on the verge of becoming another forgotten crisis. With escalating food fuel prices, and unprecedented water shortages that are already taking a toll on livestock producers and farmers, millions of Syrians are struggling each month to survive.

- ***Syria: From Punitive Sanctions to an Incentive-Based Approach*, the Carter Center and Fourth Freedom Forum (2022).**
<https://www.fourthfreedomforum.org/publications/syria-from-punitive-sanctions-to-an-incentive-based-approach/>

Impacts of sanctions in Syria:

- Marginalized middle class, idle young men vulnerable to recruitment by terrorist groups
- decreased humanitarian projects, NGOs fear that their work will be considered a "reconstruction project," and violate sanctions
- sanctions pushed much of economy into informal sectors, leading to illicit trade networks
- Lower agricultural yields
- Farmers dependent on illicit trade
- 3-6 hours of electricity for most of the nation
- shifted Syria's economy toward a private, informal trade system within the country

Recommendations:

- Incorporate expiration dates into sanctions, encouraging more meticulous planning and policy development, integrating periodic reviews of sanctions
 - improve regulatory guidance + trust by ensuring continuous dialogue between sanctioning authorities, donors, banks, and financial sector regulators
 - promote regular monitoring, evaluation, and reporting on the unintended consequences of sanctions on humanitarian activities
 - establish a financial channel between a correspondent bank and private bank in Syria for humanitarian organizations to transfer directly and access funds in Syria
 - provide broad exemptions for humanitarian work in sanctions resolutions
 - standardize definitions of key terms as well as the criteria used to apply these designations
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- establish a diplomatic framework that outlines key tracks, reciprocal steps within each track, an implementation timeline, mechanisms for monitoring progress

- Zaki Mehchy and Rim Tukamani, "[Understanding the Impact of Sanctions on Political Dynamics in Syria,](http://eprints.lse.ac.uk/108412/1/CRP_understanding_impact_of_sanctions_on_political_dynamics_syria.pdf)" Conflict Research Programme at the London School of Economics (Jan. 2021).
http://eprints.lse.ac.uk/108412/1/CRP_understanding_impact_of_sanctions_on_political_dynamics_syria.pdf

In this report, the authors study the impact of sanctions on political dynamics in Syria, through three phrases. Ultimately, they find that sanctions have depleted public financial resources, provoked the flourishing of the shadow economy, damaged independent businesses, and impoverished ordinary Syrians. They also find that sanctions have transformed elite dynamics among the Syrian elite, by providing them with a new external role— those who have the resources and connections to circumvent sanctions have become the new gateway for the regime and its officials to the external world.

- Dr. Johan Schaar, [The Burden of the Unintended: The Humanitarian Consequences of Sanctions and the Role of the Red Cross Red Crescent](https://www.alnap.org/system/files/content/resource/files/main/The%20Burden%20of%20the%20Unintended.pdf), Swedish Red Cross (April 2021),
<https://www.alnap.org/system/files/content/resource/files/main/The%20Burden%20of%20the%20Unintended.pdf>
- Justine Walker, [Risk Management Principles Guides for Sending Humanitarian Funds Into Syria and Similar High-Risk Jurisdictions](https://www.graduateinstitute.ch/sites/internet/files/2020-05/26-MAY-SYRIA-Risk%20Management%20GuideFINAL.pdf), Geneva Graduate Institute Global Governance Centre (2020),
<https://www.graduateinstitute.ch/sites/internet/files/2020-05/26-MAY-SYRIA-Risk%20Management%20GuideFINAL.pdf>

With support from the Swiss government (through the Swiss Agency for Development and Cooperation), and the European Commission, the Graduate Institute's Global Governance Centre conducted a 12-month dialogue starting in February 2019 on the need to identify safe, transparent and dependable banking and payment channels for humanitarian payments in Syria. These dialogues resulted in a document on risk management for sending humanitarian funds into Syria and other high-risk, sanctioned jurisdictions. The document provides guiding principles for how banks, donors, and humanitarian actors can work together to ensure humanitarian funds enter Syria while mitigating sanctions violations.

- World Bank, *Syria Economic Monitor: Lost Generation of Syrians*, World Bank (2022), <https://documents1.worldbank.org/curated/en/099335506102250271/pdf/IDU06190a00a0d128048450a4660ae3b937ae4bd.pdf>

This comprehensive report, published in April 2022, is part of a new semiannual economic publication on the conflict in Syria and how it has impacted the Syrian economy.

The authors tie the following economic impacts to sanctions:

- decrease in imports
- contraction of economic activity across all sectors of the Syrian economy
- depletion of foreign exchange reserves
- persistent current account deficit

Iran

- Bastani et al, "Challenge of Politico-Economic Sanctions on Pharmaceutical Procurement in Iran: A Quantitative Study," *Iranian Journal of Medical Sciences* Vol. 47, no. 2 (March 2022): 152-161. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8919311/>
- Esfandiyar Batmanghelidj, *The Inflation Weapon: How American Sanctions Harm Iranian Households*, Fourth Freedom Forum (2022). <https://www.fourthfreedomforum.org/publications/the-inflation-weapon-how-american-sanctions-harm-iranian-households/>

This report traces the connection between the macroeconomic impact of sanctions and the diminished welfare of households by focusing on the economic shocks experienced by Iran in 2012 and 2018. It finds that sanctions impacted Iran's finances and supply chains, inducing persistent high inflation. The author argues that sanctions are an "inflation weapon," making basic goods including food and medicine simultaneously less affordable and less available.

- Kolja Brockmann and Keith A. Preble, *Mitigating Humanitarian Impact in a Complex Sanctions Environment: the European Union and Sanctions Regimes Against Iran*, Stockholm Peace Research Institute (2021) . <https://www.jstor.org/stable/resrep37830>

This report provides an overview of humanitarian impacts of sanctions on Iran. A key contribution is its analysis of market prices for food commodities, from 2012 to 2021 (see page 13), showing that sanctions have led to sharp increases in food prices, including for basic commodities such as rice and lentils. The report also finds a correlation between the imposition of EU sanctions on Iran, and Iran's decreased trade in medical goods with the EU.

The recommendations are focused on EU policy toward Iran:

1. Strengthen EU assessment procedures on humanitarian impacts of sanctions
 2. Expand and improve EU and national implementation guidance
 3. Strengthen engagement and coordination with the USA on sanctions
 4. Strengthen and expand the INSTEX mechanism
 5. Increase resources for licensing and enforcement
 6. Increase EU engagement with humanitarian aid organizations
- **Human Rights Watch, 'Maximum Pressure': US Economic Sanctions Harm Iranians' Right to Health,** October 29, 2019.
<https://www.hrw.org/report/2019/10/29/maximum-pressure/us-economic-sanctions-harm-iranians-right-health>
 - **Hadi Kahalzadeh, "'Maximum Pressure' Hardened Iran Against Compromise: Sanctions Shrank the Middle Class and Empowered the Revolutionary Guards,"** Foreign Affairs, March 2021.
<https://www.foreignaffairs.com/articles/iran/2021-03-11/maximum-pressure-hardened-iran-against-compromise>

Kahalzadeh reveals that maximum pressure sanctions altered the social class structure of Iran, moving a significant portion of the middle class to the poverty level. Iran's middle class has shrunk from 45 percent of the population in 2018 to 30 percent in March 2020. The IRGC has taken advantage of economic hardship by making itself economically indispensable. It uses charity-based student camps to provide relief to poor areas. Sanctions have led to political consolidation for hardliners and a decimation of more liberal, middle class elements in society. Maximum pressure, therefore, has stigmatized the prospect of engagement with the West.

- **Kenneth Katzman, *Iran Sanctions*,** Congressional Research Service (Feb. 2022).
<https://sgp.fas.org/crs/mideast/RS20871.pdf>

- Adrianna Murphy et al, "[Economic Sanctions and Iran's Capacity to Respond to COVID-19](#)," *The Lancet* 5, no. 5 (2020).

DOI: [https://doi.org/10.1016/S2468-2667\(20\)30083-9](https://doi.org/10.1016/S2468-2667(20)30083-9)

- National Iranian American Council, [Memo: The Humanitarian Impact of Sanctions on Iran](#), National Iranian American Council (Nov. 2021).
<https://www.niacouncil.org/news/memo-the-humanitarian-impact-of-u-s-sanctions-on-iran/>

This memo summarizes the impact of sanctions on Iran's response to COVID-19, the country's access to humanitarian trade, and the issues associated with humanitarian exemptions. It provides useful hyperlinks for viewing various reports of the past two years on the effects of sanctions on Iran.

- National Iranian American Council, The Impact of U.S. Sanctions on Internet Access in Iran, August 2021, <https://www.niacouncil.org/wp-content/uploads/2021/08/GLD1-Report-Final-Aug-2021.pdf>
- Norwegian Refugee Council, "US-Iran Tension Threatens Lifeline to Millions Across Middle East,"
<https://www.nrc.no/news/2020/january/us-iran-tension-threatens-lifeline-to-millions-across-the-middle-east/>
- United Nations News, "[Overcompliance with U.S. Sanctions Harming Iran's 'Butterfly Kids'](#)," United Nations (Oct. 2021).
<https://news.un.org/en/story/2021/10/1103392>
- United Nations Press Release, "[Special Rapporteur on Iran: Sanctions and the Government's 'inadequate and opaque' response have exacerbated COVID-19's Impact on Iran](#)," United Nations (2021)
<https://www.ohchr.org/en/press-releases/2021/03/special-rapporteur-iran-sanctions-and-governments-inadequate-and-opaque?LangID=E&NewsID=26870>

Venezuela:

- Atlantic Council Venezuela Working Group, *Exploring Humanitarian Frameworks for Venezuela*, Atlantic Council (2022), <https://www.atlanticcouncil.org/in-depth-research-reports/report/exploring-humanitarian-frameworks-for-venezuela/>
- "Preliminary findings of the visit to the Bolivarian Republic of Venezuela by the Special Rapporteur on the negative impact of unilateral coercive measures on the enjoyment of human rights," UN Human Rights Office of the High Commissioner , February 12, 2021, <https://www.ohchr.org/en/statements/2021/02/preliminary-findings-visit-bolivarian-republic-venezuela-special-rapporteur>
- Francisco Rodriguez, "Sanctions, Venezuela's Crisis, and Options for Economic Statecraft," Notre Dame Peace Policy, December 6, 2021, <https://peacepolicy.nd.edu/2021/12/06/sanctions-venezuelas-crisis-and-options-for-economic-statecraft/>
- Francisco Rodriguez, *Sanctions, Economic Statecraft, and Venezuela's Crisis*, Fourth Freedom Forum (2022). <https://www.fourthfreedomforum.org/publications/sanctions-economic-statecraft-and-venezuelas-crisis/>

This report finds that sanctions contributed to Venezuela's decreased oil production, which exacerbated the country's fiscal crisis and contributed to a large economic contraction. The author argues that sanctions must be reformed to introduce an oil-for-essentials program, support humanitarian agreements, and issue clear compliance guidelines.

- Mark Weisbrot and Jeffrey Sachs, *Sanctions as Collective Punishment*, Center for Economic and Policy Research (2019), <https://cepr.net/report/economic-sanctions-as-collective-punishment-the-case-of-venezuela/>

North Korea:

- Anastasia Barannikova, *Sanctions Against North Korea: An Unintended Good?* CSIS (2019) <https://www.csis.org/analysis/sanctions-against-north-korea-unintended-good>
- Kolja Brockmann, *"European Union Sanctions on North Korea: Balancing Non-Proliferation with the Humanitarian Impact,"* Stockholm Peace Research Institute (2020), <https://www.sipri.org/commentary/topical-backgrounder/2020/european-union-sanctions-north-korea-balancing-non-proliferation-humanitarian-impact>
- Korea Peace Now, *Human Costs and Gendered Impact of Sanctions on North Korea,* Korea Peace Now (Oct. 2019) <https://koreapeacenow.org/wp-content/uploads/2019/10/human-costs-and-gendered-impact-of-sanctions-on-north-korea.pdf>

In this report, the Korea Peace Now! Campaign solicited help from an international and multidisciplinary panel of experts, including some with humanitarian field experience in North Korea. The authors' combined expertise in public health, law, economics, history, and gender studies makes this report a comprehensive survey of the humanitarian impacts of sanctions on North Korea. The report especially highlights the disproportionate impacts on North Korean women.

Key findings:

- sanctions are obstructing North Korea's humanitarian needs. In practice, the United Nations' case-by-case exemptions are insufficient. Life-saving aid is being obstructed by delays, red tape, and overcompliance.
- sanctions are also impeding the economic development in the country, making it more difficult for North Korea to recover from economic crisis and famine,
- these effects have had a disproportionate impact on women, resonating with patterns observed in other sanctioned countries.

- Jessica J. Lee, *"It's Time to Reconsider Sanctions on North Korea,"* *The Diplomat* (2021), <https://thediplomat.com/2021/03/its-time-to-reexamine-us-sanctions-on-north-korea/>
- Stephanie Nebehay, *"U.N. Expert Calls for North Korea Sanctions to be Eased As Starvation Risk Looms,"* Reuters (2021), <https://www.reuters.com/world/asia->

[pacific/exclusive-un-expert-calls-nkorea-sanctions-be-eased-starvation-risk-looms-2021-10-07/](#)

- Kee B. Park, Miles Kim, and Jessup Jong, "[The Human Costs of UN Sanctions and Funding Shortfalls for Humanitarian Aid in North Korea,](#)" 38 North (2019), <https://www.38north.org/2019/08/parkkimjong082219/>
- Dr. Nazanin Zadeh-Cummings and Lauren Harris, *Humanitarian Aid in North Korea: Needs, Sanctions, and Future Challenges*, Centre for Humanitarian Leadership (2020). https://centreforhumanitarianleadership.org/wp-content/uploads/2020/04/CHL_North-Korea-Report_Final.pdf

Recommendations:

- The UNSC's 1718 Sanctions Committee should continuously engage with humanitarian agencies to monitor sanctions' impact on aid efforts.
- The DPRK government should allow access to humanitarian and UN agencies
- The US government should redesign its exemption and travel ban process to reduce administrative burden and waiting times.
- Secondary sanctions causing low-risk appetite to banks and suppliers should be addressed through a recognised banking channel
- Donors should fund humanitarian programmes in the DPRK to ensure humanitarian improvement in the country
- The humanitarian community should closely monitor levels of need from available documentation and insights from other organisations operating inside the country
- Humanitarian agencies should invest in evidence-based advocacy to demonstrate impact levels of sanctions on delivery of humanitarian aid.

- Dr. Nazanin Zadeh-Cummings and Lauren Harris, The Impact of Sanctions Against North Korea on Humanitarian Aid," *Journal of Humanitarian Affairs*, Vol. 2, no. 1 (Sep. 2020). <https://www.manchesteropenhive.com/view/journals/jha/2/1/article-p44.xml>

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